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May 27, 2011

**VIA ECF**

The Hon. Joanna Seybert, USDJ  
United States District Court for the  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: State Farm Mutual Automobile Insurance Company v. Cohan, et. al.,  
09-CV-2990 (JS)(WDW)

Your Honor:

Our office has been the counsel of record for defendants. Defendant Barry Cohan, DDS ("Cohan") is presently incarcerated at the Federal Bureau of Prisons facility at Fort Dix, New Jersey. At the last conference before the Court on May 20, 2011, in response to our oral application, the Court indicated that it would be willing to relieve us as counsel of record provided that Plaintiff did not object.

On May 23, 2011, a stipulation was filed via ECF (Docket No. 72) providing, inter alia, that Plaintiff does not oppose this stipulation and that the parties request that the Court adjourn the Order to Show Cause for a period of 45 days to allow Cohan to make alternative arrangements for counsel or appear pro se for the purposes of a the post-judgment deposition and any further proceedings in this matter.

By this letter, we are requesting that the Court grant our oral application and allow us to be relieved as counsel of record for Defendants upon notice to the Defendant via regular mail sent to the prison. We are further requesting that the Court grant the Defendant the 45 day adjournment to secure other representation.

Respectfully submitted,  
MATTHEW J. CONROY & ASSOCIATES

  
Matthew J. Conroy (MC 9014 )

cc: All Counsel via ECF